

Exhibit 4



601 West Riverside Avenue, Suite 1400
Spokane, WA 99201

Phone | 509.324.9256
Fax | 509.323.8979

March 31, 2014

Re: Outstanding Discovery
Elf-Man LLC v. Lamberson, ED WA Case No. 2:13-cv-00395-TOR

Dear Ms. Vandermay:

Thank you for your email from March 14, 2014. I trust you enjoyed your time in Central America. Welcome home.

We have reviewed our discovery requests and several items remain outstanding.

- RFP #15. We understand from your most recent email that no written agreements exist between Plaintiff and the foreign investigators. During the discovery conference, Judge Rice was clear that even if a written agreement did not exist, you must identify the terms of the agreement and information regarding the relationship between the Plaintiff and the foreign investigators. Please produce this information.
- RFP #23: In your most recent email, you note that you will send us a copy of the Elf-Man film in response to this RFP. We do not believe that is a responsive answer. We simply want to view what your foreign investigators claim Mr. Lamberson “viewed.” This request asks for a viewable copy of the material covered by the “hash number” that appears in all of the charts attached to the Complaints by Elf-Man throughout the country, SHA1:33E6C4D563C276F29A48502C6640191DE3DD72.
- RFP #27: Your email from March 14, 2014 claims that your client has no idea and is unable to identify an “original seeder” and hence was unable to provide a takedown notice. Our RFP asks you to, “*Please produce a copy of all demand letters or takedown notices to third-parties demanding cessation of infringement of Elf-Man.*” Third parties would also include individuals or companies other than potential original seeders, such as bit torrent clients, etc. Therefore, our request is for takedown notices sent to those entities and individuals as well.



- RFP #28: You have indicated your client has not yet prepared the technical report requested in this RFP. Please either produce the document or provide us with a date certain, as to when your client will produce the document.
- We also would like a copy of the Subpoena to Comcast regarding Mr. Lamberson, and Comcast's response.

I understand the challenge of attending to the buildup of work which occurs after being away from your office. However, if you can provide us with the aforementioned requests in the next day or so, I would appreciate it. Also, you have mentioned that you would like to depose Mr. Lamberson. We remain ready to accommodate that request. Please let us know when you want to schedule such deposition. Likewise, we would like to schedule the depositions of the German investigators here in Spokane. Otherwise, we need to work with your firm this month to meet the Court's request for notifications to the State Department for a request for a foreign deposition.

Thank you for your kind attention to these requests.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey R. Smith".

Jeffrey R. Smith
Lee & Hayes, PLLC
601 W. Riverside, Suite 1400
Spokane, WA 99201
509-944-4786
JeffreyS@leehayes.com

Cc: J. Christopher Lynch, Rhett Barney